

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

DEFENDANT NETFLIX, INC.'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56 and Civil Local Rules 7 and 56, Netflix, Inc. ("Netflix"), by and through undersigned counsel, moves the Court for an order granting summary judgment in its favor on all claims against it.

This Motion is supported by the accompanying Memorandum; the Declarations of Leita Walker (and its accompanying exhibits), Lisa Nishimura, Adam Del Deo, Paul Kopidlansky, Betty Heinzen, Kathleen Heinzen, Barbara Colborn, and Thomas Pankow; the parties' stipulated statement of facts; Netflix's statement of proposed material facts; the pleadings and records already on file with this Court; and any oral argument permitted by the Court on this motion.

Dated: September 16, 2022

Respectfully submitted,

s/ Leita Walker

Leita Walker
Isabella Salomão Nascimento
Ballard Spahr LLP
2000 IDS Center, 80 South 8th Street
Minneapolis, MN 55402-2119
T: (612) 371-6222
F: (612) 371-3207
walkerl@ballardspahr.com
salamaonascimento@ballardspahr.com

Matthew E. Kelley
Emmy Parsons
Ballard Spahr LLP
1909 K Street, NW, Suite 1200
Washington, D.C. 20006-1157
T: (202) 508-1112
F: (202) 661-2299
kelley@ballardspahr.com
parsonse@ballardspahr.com

James A. Friedman
Godfrey & Kahn, S.C.
One East Main Street
Suite 500
Madison, WI 53703-3300
T: (608) 284-2617
F: (608) 257-0609
jfriedman@gklaw.com

Counsel for Netflix, Inc.